

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

CHERYL SAGATAW, DEANTHONY
BARNES, ROBERTA STRONG, and
TRAVIS NELOMS, *on behalf of
themselves and a class of
similarly-situated individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his
individual and official capacity,*

Defendant.

Civil Action No.
0:24-cv-00001-ECT/TNL

**DECLARATION OF
IMOGEN PAGE
IN SUPPORT OF SECOND
MOTION FOR TEMPORARY
RESTRAINING ORDER**

DECLARATION OF IMOGEN PAGE

I, Imogen Page, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Imogen Page and I am 29 years old.
2. I am a University of Minnesota Master in Social Work student. As a social work student, I spend a lot of time providing services and studying the history of US policies. I focus on housing, mental health, substance use, welfare policy and its shortcomings, and criminalization. Through my internship, I provide services to low-income people and people experiencing housing instability.
3. I got involved with Camp Nenookaasi because I live nearby and I try to be involved in my community.
4. I heard on Tuesday morning, January 30, 2024, on social media that there had been a short-notice eviction. Residents requested help with packing up their belongings, tearing down their yurts, because police had given them a very short amount of time to clear the space. I went to the area and saw a lot of police vehicles and roads closed down. When I arrived at 9:45 AM, I saw several dozen neighbors there to help residents do what they needed to do to clear the camp to comply with police orders. They were not allowed into the camp by police. I also saw at least four people who were there to help family members who lived in the camp. They had difficulty getting in. Police did not initially allow them in. I also saw police try to prevent City Councilmember Robin Wonsley from trying to enter the camp. She was ultimately able to enter, but they got in her way at first.
5. Camp Nenookaasi has been an important place for unhoused neighbors, especially Native neighbors. My understanding is that this camp has provided unhoused community members with a much safer living situation than they've previously had, that it has been a place where county and social service agency workers as well as harm reduction workers have been very accessible, and where residents have been able to access a lot of services including housing, mental and physical healthcare, drug resources, and case management. I also understand that this camp has been spiritually and culturally supportive, and that that is connected with lower rates of violence and overdose than in other encampments and that it's certainly been safer for people than camping on their own. The leadership of the camp and the community has been able to get the city to provide some basic services such as trash collection and porta potties (though I don't know if they ever arrived. I understand they were working on it). Overall, more safety, more stability, more access to services that allow people to meet their goals, whether it is housing or something else.
6. My understanding as someone who lives in the neighborhood is that camp Nenookaasi exists because of the continued displacement of Native people from their land, because

of discriminatory housing policy, because of Federal, city, and state mismanagement of the opioid crisis, and because community members are doing their best with the resources they have available to them to keep one another as safe as they can.

7. Camp Nenookaasi has been a place where social service workers are regularly visiting so that residents have more reliable access to them. People from nonprofits, people from county agencies, volunteers and organizations that distribute supplies (safe use kits, naloxone, things like that), places where friends and family members can visit more safely and help them out. The structures at Nenookaasi seemed to me safer than many of the tents that people live in in other encampments. There has clearly been substantial community effort to construct them, make them as dignified, comfortable, and safe as possible.
8. These yurts are built with care. The design is very impressive. The walls are made with diagonally-overlapping slats, which can be opened and closed like an accordion. The ones I helped to deconstruct had small stoves with chimneys and the roofs and walls were made with a top layer of waterproof tarp. On the inside, there was silver reflective space blanket material to reflect heat inward. People had small seats and blankets with layers of cushions to sleep on. They had supplies of things like paper plates and disposable spoons to eat with. It was a great deal of material. Because of the weather, it was wet, and quite heavy and difficult to move.
9. In the neighborhood, Nenookaasi has a reputation for being a safer place for the residents than many camps. People are getting services, getting housing, getting into treatment, and drug overdoses are really being reduced because of the safety and support of the camp. Camp Nenookaasi certainly helps residents get services, apply for benefits, get legal support, apply for housing. I am not personally involved in that service provision. But I have heard from trusted individuals that it has been an incredibly helpful part of the camp. I have heard it from residents themselves and people who volunteer regularly and people who have a long history of knowing the neighborhood and the neighbors. The culturally-specific supports that the camp provided are a big part of that.
10. I am sure that every individual has many personal goals with being at or supporting Nenookaasi. The goals I have heard people speak to are having a safe, stable place to live; being able to access resources and services; and living free from police harassment.
11. I have been aware of past Camp Nenookaasi locations and evictions, although I was not physically present at any evictions before the one on January 30. My understanding is that in prior evictions there has been very short notice from police and from the city. Residents have had limited time to pack up their belongings and leave under threat of arrest, have been offered no viable place to go—no safe, dignified alternatives—and the police and the city has offered no assistance in packing up belongings and residential

structures etc., and community members have had to come together and help and support members under really undignified circumstances.

12. My understanding is that evictions often take place early in the morning with as little as 90 minutes or less warning. Communication has been very poor between the city/the police and residents. Possibly, these evictions have been timed to make it more difficult to move or to make residents' lives more difficult. I know that the city and the police department spend hundreds of thousands of dollars on each eviction. As a taxpayer, this is deeply distressing to me. There are so many services, and so many options for dignified housing, that we could be spending our money on as a city.
13. The cruelty with which police officers refuse to let neighbors in to help when residents ask repeatedly that we be allowed in to help is quite astonishing. Last Tuesday, it struck me as entirely arbitrary who was being allowed in when and how many people at a time. The officers at the tape line kept telling me that they weren't the ones making the decisions. But then we saw them make the decisions about who was coming in without consulting others. They let 5-10 people in, said in another 15-20 minutes we would let more in. An hour passed. I saw a person trying to get in to help her son move, someone with her mother trying to get in to help her grandmother move, and another person trying to reach a relative that may have been her mother but I'm not 100% sure. These four people were trying to get in to help their three relatives and had trouble getting in. All got in eventually, but it took a long time for them to get in. There were people willing to help, and people with contractor bags, trucks, that were denied entry. Press wasn't allowed in either. I saw members of the press requesting access and being denied. Residents were begging and screaming and asking repeatedly that we be allowed in to help. Residents were allowed only a few people there and themselves to pack up all their worldly goods. To my knowledge, the city did not provide bags or storage or any help at all.
14. At this January 30 eviction last Tuesday, I saw SouthSide Harm Reduction, I believe there were some Hennepin County Social Workers, and outreach harm reduction workers from another non-county organization. I am not aware of any particular housing or service options offered by the city or the police department. I heard several people saying they did not know where they were going to go after their homes were removed.
15. Police presence was very heavy at this eviction. Many cross-streets were blocked off with police vehicles. I came up on Bloomington and saw 2 or 3 cross-streets blocked off. My understanding was that the perimeter was similarly blocked with checkpoints. I saw one person with a pickup truck who was trying to get through to help people move things. That person was sent back and forth between multiple checkpoints. At each checkpoint, they said "go to the other checkpoint, they'll let you in." They didn't. I saw

this happen. 3-5 officers if not more at each tape line. Many police vehicles and officers inside the taped-off area. Many police vehicles outside. The police chief was present early on. He left. I saw him leave. There were many police officers standing around preventing neighbors from entering. I did not see them help residents. I heard one police officer having a conversation about how “the ACLU was biased.” Press was repeatedly denied entry into the area by police officers.

16. During evictions at which I am present, I do not see, hear, or otherwise observe residents being informed of safe places for them to go. I have seen in the news conversations about inadequate shelter options, and I know the shelter beds to be insufficient because I hear directly from unhoused people and from others helping unhoused people that the number of beds is insufficient compared to the number of people needing a place to sleep. I also know this myself, as someone studying this through my social work training, the low number of shelter spots available, and the ways that shelters even when a spot can be obtained are unsafe, unpredictable, and otherwise inappropriate for many unhoused neighbors.
17. Speaking to the Tuesday eviction, I believe that everyone living there was under threat of arrest if they did not leave very quickly or perhaps if they stopped packing for a few moments. I saw at least two people carrying pets and trying to figure out where they could go with their pets. I saw a resident weeping as she tried to gather her belongings. It was very hectic. Residents were using contractor bags or any container available to stuff supplies such as clothing, bedding, camp stoves, food, camping supplies, and store and mark them with duct tape so they did not get confused with other residents’ belongings or trash. We were using our bare hands to tear down yurts to preserve the components without damaging them or mixing them up so they could be reused in the future. There were residents who said “this is my roommate’s stuff. I don’t know where she is. I don’t know what she wants done with it.” There appeared to be people who were absent who were unable to save their belongings or had to rely on someone else doing so. People needed to find their own place to transport their stuff to, and find their own way to transport their stuff.
18. At the January 30th eviction, the weather was a little bit above freezing. It was gray, it was damp. The ground was quite muddy. It was easy to slip. Many of the blankets and other yurt components were damp, which made them heavy and more difficult to pack and move. To my knowledge, the city had provided no running water or hygiene setup to the camp. Because people with vehicles were not allowed to get very close, residents were forced to drag their belongings through the mud without anything to carry them. The camp was surrounded by a chain link fence, so there was only one way in and out.
19. My understanding is that repeated evictions have really undone a lot of the benefits of

the camp that we have talked about. They have forced people to find different and often much more dangerous places to stay, people have repeatedly lost most of their belongings, people have lost contact with services providers, and people have lost the safety that the camp provided, particularly for women. My understanding based on what I have heard from residents and other neighbors is that, for women, being in a camp with a supportive culture like Nenookaasi made them feel safer and made them less vulnerable to trafficking or sexual violence and gave them easy access to services if they do experience violence. Losing that is significant. I would add that I imagine being in a larger camp with these supports also protects them from police violence to some extent because there are witnesses around, because there are witnesses.

20. For me as a neighbor, these evictions are shocking. I feel anger and outrage and deep deep sadness, and frustration that the city is spending its resources on repeatedly traumatizing my neighbors instead of investing in the services we need in this city. Every day in my neighborhood going to and from school and work I see people outside and I know they have been evicted from camps such as this and disconnected from people they were building safety with. My taxes helped pay for that, and that's pretty devastating.
21. My understanding is that the Mayor justifies these evictions by talking about public safety and the need for more permanent housing solutions. But he has done very little to make better options available. The mayor has demonstrated absolutely no ability to prevent the police department from committing crimes against the community, he has put private developers and rental profits above the needs of ordinary Minneapolis residents. He is responsible for the violence and the deaths that will result from this eviction. We know that evictions lead to death. They lead to people dying from exposure, they lead to people dying from overdose, they lead to people being forced into more and more dangerous conditions to meet their needs. He is directly responsible for that. The mayor's justifications for the evictions have not been honest or accurate. COVID is still impacting all of us in Minnesota. The Mayor is depriving people of homes in the winter during a respiratory pandemic. The health outcomes of evictions are atrocious and lead to death.
22. I am giving this declaration because I think it's important to have a record of how the city and the police are carrying out these evictions, because it is atrocious. Hopefully, giving this declaration can help change these policies and prevent atrocities from happening in the future.
23. As someone who is in school to be a Social Worker and provide services to my community, I am really appalled with how the City of Minneapolis and the police department are creating more problems for residents instead of solving them. They're

making it harder for everyone providing services. They're making it harder for people accessing these services to get basic housing and get access to services. It's abhorrent. I am deeply appreciative of the leadership demonstrated by these camp residents and how much they are teaching us all.

I declare under penalty of perjury that this declaration is true and correct.

Executed on February 7, 2024, in the City of Minneapolis, County of Hennepin, State of Minnesota, Treaty-Ceded Territory of the Dakota peoples.



Imogen Page